

[PAIS Large School Heads] EANS link

1 message

Gary Niels <gniels@paispa.org>

Thu, Mar 18, 2021 at 9:39 AM

Reply-To: LargeSchoolHeads@paispa.org

To: smallschoolheads@paispa.org, largeschoolheads@paispa.org

PAIS Heads, I am told that the link that I have pasted below can be helpful if your school is eligible to apply for an EANS grant. Gary

<https://oese.ed.gov/offices/education-stabilization-fund/emergency-assistance-non-public-schools/>

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[PAIS Large School Heads] Fwd: EANS - Emergency Assistance for Nonpublic Schools

1 message

Gary Niels <gniels@paispa.org>
Reply-To: LargeSchoolHeads@paispa.org
To: smallschoolheads@paispa.org, largeschoolheads@paispa.org

Wed, Mar 17, 2021 at 4:43 PM

Dear Friends,

The long-awaited information on new funding, Emergency Assistance for Nonpublic Schools (EANS), has been made available. I have attached a few documents for your perusal:

1. EANS notification letter from Acting Secretary Noe Ortega – This is an informational letter about the EANS program regarding the background, eligibility and application process.
2. EANS intent to apply form – **This form should be completed and returned to eileenwe@cciu.org by no later than April 2nd.**
3. EANS tech user guide – Critical dates of the EANS timeline, allowable expenses, and other details are outlined in this document.

The timeline is tight on this opportunity, so I am including it below for your quick reference.

- **April 2, 2021: Deadline for non-public schools to submit Intent to Apply Form to IUs**
- **March 29, 2021: Application for eligible non-public schools to be opened for IUs to submit application.**
- **April 22, 2021: Deadline for non-public schools' submission of applications to local IUs**
- **April 26, 2021: IU submission of compiled applications to PDE**
- **May 26, 2021: PDE approval of applications and final allocations for non-public schools to IUs**

As you peruse these documents, please let me know if you have questions. I will forward additional information as it becomes available.

Eileen Helm Weaver, Ed.D.
Supervisor, Non-Public School Services
484-237-5060
eileenwe@cciu.org



March 17, 2021

Dear Non-Public School Administrators:

Late last year, Congress designated a portion of the Governor's Emergency Education Relief Fund (GEER II Fund) under the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act for a new emergency assistance program, known as Emergency Assistance to Non-Public Schools (EANS). Under this new program, the U.S. Department of Education allocated \$150 million in EANS funding to the Pennsylvania Department of Education (PDE) to provide services and assistance for eligible non-public schools to address educational disruptions caused by COVID-19.

Below is information about which schools are eligible to benefit from the EANS program and the application process. Please be aware this funding is different from the typical process for providing equitable services to nonpublic schools.

To be eligible to receive services or assistance under the EANS program, a non-public school must meet the following requirements:

- Is non-profit;
- Is accredited, licensed, or otherwise operates in accordance with State law;
- Was in existence prior to March 13, 2020, the date the President declared the national emergency due to COVID-19; and
- Did not, and will not, apply for and receive a loan under the Small Business Administration's Paycheck Protection Program (PPP) (15 U.S.C. 636(a)(37)) that was made on or after December 27, 2020.

Application Process

Eligible non-public schools will apply for assistance through their local intermediate units (IUs).

Interested non-public schools must complete and submit the attached Intent to Apply form to their local IU by no later than April 2, 2021.

IUs will begin emailing the EANS program application to eligible non-public schools that submitted an intent to apply form on March 29, 2021. Schools then have until 5:00 PM on April 22, 2021 to submit completed applications to their local IUs. **Applications received after that time and date will not be accepted.** Local IUs will upload completed applications and data into the PDE eGrant system by April 26, 2021.

Allocations

Initial allocations to eligible non-public schools will be calculated on a baseline per pupil amount. The allocation will be determined by the non-public school's total number of enrolled students from the October 2019 data collection in the PDE Pennsylvania Information Management System (PIMS). PDE will allocate 70% of the state's \$150,000,000 award amount to nonpublic schools based upon the total enrollment for each school based upon the PIMS data. The preliminary baseline per pupil amount is \$460 per enrolled student.

Each non-public school will base their preliminary EANS program and budget on this initial per pupil allocation and include that information in the EANS application. The school must also provide in the application the number of low-income students enrolled and the impact of COVID-19 on the school and students. This information will be used to adjust for final allocations including distributing the remaining 30% of the funding to address income and COVID-19 impact, both requirements of the EANS program.

In accordance with federal statute, PDE will process applications within 30 days of receiving them from the IUs and provide grantees with final allocations by May 26, 2021.

When EANS recipients receive those final allocations, they will need to adjust their budgets and programming accordingly and return a revised application to their local IU. The IU then will submit the revised application to PDE on their behalf.

Questions about the EANS program and the application process should be directed to the local IU. Schools also should watch for communication from their IUs regarding the application process.

Additional information can be found on the [PDE website](#). Thank you for your dedication to educating students during these challenging times. The PDE team looks forward to working with non-public schools and the IUs to make the EANS program a success.

Sincerely,

A handwritten signature in black ink, appearing to read "Noe Ortega". The signature is fluid and cursive, with the first name "Noe" being more prominent.

Noe Ortega
Acting Secretary of Education

Emergency Assistance for Nonpublic Schools (EANS)

1. If emails were sent early this morning to the NPs with the three documents (letter, Intent to Apply Form, and Technical Guide), is it a problem if the generically addressed letter from Acting Secretary Ortega was sent? It wasn't understood that the letters were to be individually addressed via a mail merge. SM: IUs do not have to go back and personalize the letter as long as there is a system in place to determine receipt. For example, the USPS letters are being sent certified so there will be evidence of receipt. IUs should follow up via email if they haven't gotten a response or if emails have bounced back. PDE's recommendation is to track via a spreadsheet to ensure communication has been made. It is very important all eligible nonpublic schools receive notification of the EANS program and application process.
2. Is it possible for us to send applications to NPs as soon we receive it from Eric (prior to the March 29 date)? SM: We have to stick to our 3/29 date for the nonpublic schools to receive our application – this is due to the statutory timeline that begins when the IUs receive the application and this is again, our approved timeline.
3. If we're sending information to the Diocese, it is our understanding that each individual school will need to submit an Intent to Apply and then an application. We just want to confirm this. SM: Yes, we need an intent to apply from all schools within the Diocese. Whether they all come from the Diocese or from separate schools.
Follow-up: I thought the Diocesan Central Offices could fill out the intent to participate letter for all their schools? I have been told some IU's are saying they received new guidelines from you saying we cannot, did something change? Please see email chain below: SM: I apologize, during our first round of conversations, I don't think we were on the same page. We do need collect "intent to apply" information for all nonpubs, even if they are within a Diocese. If a Diocese rep can do this successfully on a spreadsheet, PDE is okay with this. Some IUs suggested it may vary by Diocese. However, we will allow for a spreadsheet to be submitted to make it a more efficient process for all.
4. Could there be a case where a NP provides an application without having submitted an Intent to Apply? Our understanding is that in order to obtain an application they have to have submitted an Intent to Apply Form. SM: We need an intent to apply form from every NP school applying so we can get them into the eGrants system and it will help IUs & DFP track nonpublic applicants.
If they received an application template from the Diocese or another NP and we don't have an Intent to Apply Form, should we send those onto you? SM: The IU should follow back up with the NP school and have them complete an intent to apply.

5. One of the criteria is NOT to apply for PPP in the second round. Applying for the Employee Retention Credit (ERC) should have no bearing here, correct? We are looking into that as they have revised the eligibility criteria for that program for 2021. SM: Correct, there is no mention of this credit program in EANSs, so that should have no impact on eligibility.

2. a) There is confusion around the allowable activities on page 2 of the Technical Assistance Guide followed by non-allowable activities, which appear to be some of those same items under allowable activities. b) It says the IU's may not reimburse a non-public school. Does that mean the IU has the discretion to decide, since it doesn't say "will not" reimburse? SM: I understand this confusion. My team & I sat in on office hours hosted by USDE and they addressed this, the info seems contradictory, but it's not. This is in the FAQ, D-1 & D-3. IUs can cover these costs through contracted services, but they may not reimburse NP schools if they already paid for these types of activities to happen. The activities are allowable, but not through the reimbursement process.

3. Do you know what accounting codes to use for these EANS Non-Pub funds? Is there another contact at PDE we can check with on the Chart of Accounts to see if it will be updated with new codes? SM: I will have to check with the budget office on this – thanks for bringing it up now.

4. The letter from Secretary Ortega talks about October 2019 data, but the tech guide asks the schools to provide 2020 data. October 2020 enrollment data should be used. I know I mentioned this the other day, but I didn't get an answer, so I am addressing it again. From my understanding the enrollment date for all CARES Act funding is the **2019-20** school year (Enrollment data collected the year prior to COVID). Since PDE requires all nonpublic school enrollment for any given school year in October, than the **October 2019**, should be the date. The EANS "User Guide" you sent out identifies **October 2020** as the date, but the EANS "Letter" identifies the date as **October 2019**. Am I correct? If so, you will need to correct the EANS User Guide. SM: The state has flexibility with this and is trying to allow for the nonpubs to use their most advantageous enrollment data. USDE has even suggested that "estimated low income numbers be accepted by the state if firm numbers can not be verified. I've copied in the FAQ for your review. If you have more feedback on this, I'm happy to discuss.

5. Which schools should receive the letter regarding EANS, Intent to Apply, and User Guide? The packet is supposed to be sent to all of the NPs on the Federal Grant 3.15.2021 excel sheet as well as the NPs on the Amish & Mennonite list. . If you are contacted by a nonpublic school that is not on our list, it's important that I know about so I can share with the nonpublic office. We have to determine if they are eligible (nonprofit, PDE licensed, approved/accredited, etc) and we are using this as an opportunity to ensure we have all nonpublic information. So please share any

nonpubs that aren't on the list we provided with me first so we can verify their eligibility, and then you can reach out to them.

6. For the NPs with only physical mailing addresses, use certified mail, with return receipt requested. PDE understands that is an expense to the IUs; however, without doing that, there would be no evidence that they were sent.
7. For the NPs with email addresses, the letter, Intent to Apply Form and Technical Guide only needs to be sent electronically. If there are any undeliverable emails returned, those should be provided to PDE so they can be investigated and determine whether they have a corrected email address or need to be sent a hard copy mailing.
8. The listing of NPs with emails should be reviewed and if any discrepancies are noted (schools that shouldn't be on the list or schools that are missing), PDE should be advised of those discrepancies.
9. For the Amish & Mennonite schools that need mailed, we may need to use the school's mailing address and address it to the attention of the individual identified (some of the mailing address columns only have a contact's name, city, state, and zip code without a street or PO box address.)
10. PDE plans to put information about the EANS program on their website, and they would hope that the IUs would post it on their websites as well.
11. Within e-Grants, EANS will be under the Division of Federal Programs with a EANS identifier. The application is very close to completed, and Eric shared that it will be a fillable Word document. For those who have email addresses and can send those applications back electronically, we'll just need to copy and paste the information directly into e-Grants.

12. After the final allocations are made, the NPs will need to complete another separate form to adjust the budget for the additional dollars. Eric will develop and share that with us when it's available, and Susan will let us know when those will be due back (within a reasonable time so e-Grants can be updated.)

13. The unique RA email address has been established. This is where we will need to send the Intent to Apply Forms. It's RA-EDEANSinfo@pa.gov.

14. This has been sent to SM to review and confirm: Question 5 above indicates which schools should get the information. If we are contacted by an organization not on the list, provide the organization with the information and advise them to review it carefully to determine if they qualify.

15. The EANS "User Guide" also mentions in the "EANS Non-public Program Funding Availability" section that the EANS program is effective from **March 13, 2020** through **September 30, 2022**. From my understanding all CARES Act funding is good through **September 30, 2023**, which is even mentioned in the "Equipment Tracking for IU's and Non-public Schools" section. Am I correct? If so, you will need to correct the EANS USER Guide. SM: The EANS funds are available for expenditures and programming through September 30, 2022. The period of performance is until September 30, 2023... two different things. This is in the User Guide because IUs have to track all purchased equipment and will be interacting with nonpublic schools for equipment tracking at least until 9/30/23 for EANS 1.

16. I see question 5 on the shared EANS Google doc indicates who should get the information. If we are contacted by an organization not on the list do we have a unified response? SM: Thanks for the information. If you are contacted by a nonpublic school that is not on our list, it's important that I know about so I can share with the nonpublic office. We have to determine if they are eligible (nonprofit, PDE licensed, approved/accredited, etc) and we are using this as an opportunity to ensure we have all nonpublic information. So please share any nonpubs that aren't on the list we provided with me first so we can verify their eligibility, and then you can reach out to them.

17. If a school has two campuses, does each school campus need to apply separately or can they combine campuses in their application? SM: If a school has two campuses, but is considered one school, under one AUN, one application is required. Similarly, if a school has two campuses, is each school campus allowed to apply separately if they have differing AUNs? SM: If a school

has different AUNs, they must apply separately, as they should be considered two different schools, unless there is a circumstance I'm not aware of.

18. Is installing AC in a school is an allowable expense? SM: No, it's not an allowable expense, unless it is portable, AC units are not in the allowable expenses in the FAQ.
19. Should the IUs be "policing" what the NPs put on their applications. For example, if they put water filtration stations since schools aren't allowing use of water fountains, is that considered a consumable type of resource or something more permanent? In essence, for anything that is a reimbursement of a prior expense (going back to March 13, 2020), we are to verify it's an allowable expense. For anything that is a budgeted expense they want to spend, should we submit their applications (since we'll be copying and pasting into e-Grants) for whatever they indicate and if it's deemed not to be an allowable expense, PDE will deny it? Some of the IUs are concerned about their limited staffing and ability to screen everything to determine whether it's allowable or not, especially if it is down to the wire between April 22 and April 26. SM: I think it's important we make a distinction between PDE's role and the IU's role with the IGA (IUs as contractors) and PDE (ED's grant recipient.) IUs do not need to "police" what nonpublic schools are putting into their applications, DFP will be reviewing the information and flagging narratives/budget for corrections. When DFP returns the apps for funding adjustments, these corrections will take place. However, when IUs are reimbursing NPs for expenses they will be verifying the services/reimbursements are reasonable, necessary & allowable... before services/reimbursements take place.
20. If a school requests a contracted service such as an extra school counselor, is that allowable with EANS funds? If so, would all services need to be completed within the 6 months or could a contract extend through June 30, 2022?